

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

REBECCA MITCHELL,

Plaintiff,

v.

Case No. 2:18-cv-2351-JPM-cgc
Jury Demanded

AARON'S, INC,

Defendant.

JOINT MOTION FOR ENTRY OF CONSENT PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff and Defendant jointly move the Court to enter a Protective Order, and in support of their motion, the parties respectfully state as follows:

1. Some of the materials produced in discovery by the parties and certain non-parties have been designated as confidential and highly confidential and therefore limited to disclosure.
2. The parties, through counsel, have consulted and have agreed on the terms of a Protective Order to address the parties' concerns about production and disclosure of confidential information, and they have informally cooperated in producing materials in discovery subject to their agreement as to confidential and "Attorneys' Eyes Only" documents and information. The proposed Protective Order has been submitted to the Court as provided by the local rules.
3. The parties now jointly move the Court to enter the proposed Protective Order pursuant to Rule 26(c) to adopt the parties' agreed-upon process for producing such materials.

CERTIFICATE OF CONSULTATION

The foregoing motion is filed by all parties jointly as a result of successful consultation under with L.R. 7.

Respectfully submitted,

HARRIS SHELTON HANOVER WALSH, PLLC

BY: s/ Laura S. Martin
Laura S. Martin Tenn. Disc. No. 26457
6060 Primacy Parkway, Suite 100
Memphis, Tennessee 38119
(901) 525-1455
lmartin@harrisskelton.com

Counsel to the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2018, a true and correct copy of the foregoing served via electronic mail on counsel for the Defendant:

Donna L. Keeton
HALL, ARBERY, GILLIGAN, ROBERTS & SHANLEVER LLP
3340 Peachtree Road, Suite 1900
Atlanta, GA 30326
dkeeton@hagrslaw.com

Geoffrey A. Lindley
RAINEY KIZER REVIERE & BELL PLC
209 E. Main Street
Jackson, TN 38301
glindley@raineykizer.com

s/ Laura S. Martin
Laura S. Martin